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December 7, 2020

VIA ECF

Honorable Freda L. Wolfson, Chief Judge
United States District Court- District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 5E
Trenton, NJ 08608

Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation - MDL 2738*

Dear Chief Judge Wolfson:

I write regarding the J&J defendants' Motion to Dismiss six cases for failure to comply with the Court's October 13, 2020 Order directing filing of amended complaints. [Doc. No. 15833].

The J&J defendants have consented to plaintiffs' request to file their amended complaints late, which has now been done in all six cases. As these plaintiffs are now in compliance with October 13, 2020 Order, defendants hereby withdraw the motion in its entirety.

After we filed the motion, the responses from plaintiffs' counsel revealed that they are not reviewing documents filed on the electronic docket, the transmission of which constitutes the notice required by Federal Rules of Civil Procedure 77(d). See District Of New Jersey ECF User Manual (Rev. June 23, 2017) at p. 9-11. Rather, they were expecting personal service of each pleading. We have corrected this misperception. It might be helpful for Ms. O'Dell and Ms. Parfitt to remind their constituents that they need to pay attention to the electronic docket so that we do not have to go through this again.

Honorable Freda L. Wolfson,
Chief Judge

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Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Susan M. Sharko

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*Attorneys for Defendants Johnson & Johnson
and Johnson & Johnson Consumer Inc.*

cc: All Counsel of Record (via ECF)
Leigh O'Dell, Esq.
Michelle Parfitt, Esq.

ORDERED that the Clerk's Office is directed to terminate Defendants' motion to dismiss [DKT 15833].

Dated: 12/8/2020

/s/ Freda L. Wolfson

Freda L. Wolfson
Chief Judge